



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10

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OFFICE OF
ENVIRONMENTAL
CLEANUP

APR 16 2014

Ms. Amy Essig Desai
Farallon Consulting, LLC
975 5th Ave Northwest
Issaquah, Washington 98027

Mr. Gil Leon
Earl M. Jorgensen Company
10650 South Alameda
Lynwood, California 90262

Re: Revised Comments on Memorandum Re: Jorgensen Forge Early Action Area Removal Action Addendum to the Final Basis of Design Report Administrative Order on Consent, EPA Docket No. CERCLA 10-2013-0032, dated February 20, 2014. Comprehensive Environmental Response, Compensation and Liability Act
Administrative Order on Consent, U.S. EPA Docket No. CERCLA 10-2013-0032

Dear Ms. Essig Desai and Mr. Leon:

On March 17, 2014, the EPA provided comments to you regarding the *Memorandum Re: Jorgensen Forge Early Action Area Removal Action Addendum to the Final Basis of Design Report Administrative Order on Consent, EPA Docket No. CERCLA 10-2013-0032*. Based on subsequent conversations with you, the EPA is revising several of its comments. Because these comments are being revised by this letter, the EPA extends the timeframe to provide the final revisions to this document to April 23, 2014.

EPA revises the following comments:

- **Dredge depth for "Section B" and "Section E" (Figures 8c and 8b):** In EPA's 3/17/14 letter, we requested that EMJ extend the dredge depth to be as deep as the first sample depth interval below the Removal Action Level (RvAL) (-13.2 MLLW). On April 14, 2014, the EPA received from Anchor QEA a diagram projection of soil boring JFOS2-BH04 showing that the dredge depth of -12.0 Feet MLLW is within the horizon of samples below the RvAL. Therefore, the EPA is rescinding the requirement to dredge to -13.2 MLLW. A removal depth of -12.0 feet MLLW is acceptable, however, one confirmatory sample within the z-layer within the cross-section of Section B and E is required (see below).
- **Confirmatory sediment samples within cofferdam and bank:** The EPA is removing the requirement to provide a confirmatory sample from the bank given that the sheet pile wall will remain in place after the completion of the removal action. Instead, as described earlier, the EPA is requiring one confirmatory sample in the z-layer, consistent with the confirmatory sampling specified in *Appendix D Construction Quality Assurance Plan* of the approved *Basis of Design Report Jorgensen Forge Early Action Area* within the cross-section of "Sections B" and "Section E" associated with the Geoprobe soil boring JFOS2-BH04.

- **Water Quality Monitoring of Treated Barge Water associated with Cofferdam Sediments:**
The EPA will require Tier 1 intensive monitoring (rather than the Tier 2 monitoring specified in our March 17th comment letter), as defined in our August 9, 2013 Clean Water Act § 401 Water Quality Memorandum for this site. The EPA anticipates that the data collected during this sampling event will be used for information purposes only.

Please contact me if you have any further questions at (206) 553-1774 or by electronic mail at Chu.Rebecca@epa.gov.

Sincerely,



Rebecca Chu
Remedial Project Manager
Remedial Cleanup Program

cc: Ryan Bath, Anchor QEA
Maureen Sanchez, Washington State Department of Ecology
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